

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CYNOSURE, LLC, a Delaware limited liability company; and LOTUS PARENT, INC., a Delaware corporation;

Plaintiffs,

v.

REVEAL LASERS LLC; a Nevada limited liability company, *et al.*

Defendants.

Civil Action No. 1:22-CV-11176-PBS

**MICHELMAN & ROBINSON’S STATEMENT IN RESPONSE TO PLAINTIFFS’
EMERGENCY “MOTION FOR ACCOUNTING
AND TO PREVENT THE DISSIPATION OF ASSETS”**

1. As this Court is aware, Plaintiff’s Emergency Motion for Accounting and to Prevent Dissipation of Assets (“Plaintiffs’ Motion”) is scheduled for hearing on March 7, 2025. However, based on Plaintiffs’ Motion and the relief requested therein, and as is addressed in Michelman & Robinson’s (“M|R”) Motion to Withdraw and Emergency Motion to Continue Plaintiffs’ Motion, M|R is unable to ethically file a substantive opposition on behalf of any party. In short, based on the content and allegations relied upon by Plaintiffs in their motion, and without accepting or addressing the merits or accuracy of the same at this stage, M|R is prohibited from filing any substantive opposition at this stage.

2. In addition, with respect to Plaintiffs’ Motion, it is anticipated that at least some of the Defendants currently represented by M|R against whom Plaintiffs seek relief may have new counsel make an appearance on their behalf on, or prior to, the date of the hearing.

3. Based on the foregoing, it is requested that this Court issue a briefing schedule on Plaintiffs' Motion and continuing such motion and related filing dates to a later date, sufficient for Defendants to retain new counsel and file any opposition each of them deems fit.

4. A copy of this Motion statement will be provided to all parties immediately upon filing as well.

Dated: March 5, 2025.

Respectfully Submitted,

DEFENDANTS,

By their attorneys,

/s/ A. Madison Dini

A. Madison Dini (admitted *pro hac vice*)

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CERTIFICATE OF SERVICE

I, A. Madison Dini, hereby certify that on March 5, 2025, a copy of the foregoing document was served on counsel for all appearing parties via the ECF filing system.

/s/ A. Madison Dini

A. Madison Dini